

EXHIBIT C

EXHIBIT E

George Marion Corson

February 6, 2008

IN THE COURT OF COMMON PLEAS
FOR THE COUNTY OF PHILADELPHIA

GEORGE CORSON and FREIDA : JUNE TERM, 2007
E. JUNG CORSON, h/w

vs.

CLARK EQUIPMENT, et al. NO. 1384

9 Philadelphia, Pennsylvania
10 February 6, 2008
11
12 - - -
13 Deposition of GEORGE MARION
14 CORSON, held at the offices of PARAGON COURT
15 REPORTING, LLC, on the above date at 10:10 a.m.,
before Frank Frontino, a Registered Professional

Paragon Court Reporting, LLC
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Philadelphia, Pennsylvania 19106
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Paragon Court Reporting, LLC

Paragon Square Reporting, LLC

George Marion Corson

February 6, 2008

	129	1 G. M. Corson 2 Tell us about the exhaust 3 gaskets. 4 A. You'd take the bolts out of the 5 exhaust stack and lift it up in the air and slide 6 the gasket out and put the new one in, put the 7 bolts in and tighten it down. 8 Q. Did it have to be scraped? 9 MS. DYSON: Objection. 10 THE WITNESS: Occasionally. 11 BY MR. PAUL: 12 Q. What did you have to scrape it out 13 with? 14 A. A putty knife. 15 Q. Sir, you mentioned, I believe, 16 compressors this morning. 17 A. Yes, I did. 18 Q. Okay. Do you recall the names of the 19 compressors that were used at the railroad? 20 MR. POWELL: Objection. 21 THE WITNESS: There was 22 Ingersoll-Rands and -- and a few others. 23 BY MR. PAUL: 24 Q. Do you recall the names of any of 25 the other --	131	1 G. M. Corson 2 I've not been a railroader. The lawyers 3 here are not railroaders. 4 If this is read to a jury, a 5 jury's not going to know what a railroad part on 6 a compressor is. You have to tell us. 7 A. Brake cylinders, I believe. 8 Q. Okay. 9 A. I think they manufactured safety 10 valves and -- 11 That's about all I can think 12 of right now. 13 Q. Was there anything else in the 14 Westinghouse Air Brake compressor? 15 MR. CAGNOLI: Object to the 16 form, "compressor." 17 MR. PAUL: He said 18 compressor. 19 MR. CAGNOLI: I don't think 20 he did. 21 THE WITNESS: Not that I'm 22 aware of. 23 BY MR. PAUL: 24 Q. Was there a gasket in the compressor? 25 MR. CAGNOLI: Objection to Paragon Court Reporting, LLC
	130	1 G. M. Corson 2 I'm sorry. I didn't mean to 3 cut you off, sir. 4 Were there any compressors on 5 the railroad equipment itself? 6 A. Yes. 7 Q. And who manufactured those, if you 8 recall? 9 A. To my best knowledge, I think it was 10 Gardner (phonetic). 11 Q. "Gardner." 12 Do you recall the name 13 Westinghouse Air Brake? 14 MR. CAGNOLI: Objection. 15 BY MR. PAUL: 16 Q. You can answer the question. 17 A. Yes. 18 Q. What do you recall about Westinghouse 19 Air Brake, sir? 20 A. Westinghouse, I believe, supplied 21 most of the air brake parts. 22 Q. What kinds of air brake parts did 23 Westinghouse supply -- Westinghouse Air Brake 24 supply? 25 I mean, understand, you and	132	1 G. M. Corson 2 the form. 3 THE WITNESS: Oh, yes. 4 BY MR. PAUL: 5 Q. Where was the gasket in the 6 Westinghouse Air Brake compressor? 7 MR. CAGNOLI: Objection. 8 THE WITNESS: Under the head. 9 BY MR. PAUL: 10 Q. What's a head? 11 I'm sorry. 12 MR. POWELL: Objection. 13 BY MR. PAUL: 14 Q. I'm asking you to explain things that 15 are so obvious to you. 16 A. It's a head that holds the valve that 17 lets the compressor build the air. 18 Q. Did your dad ever remove one of these 19 gaskets from a Westinghouse Air Brake compressor? 20 A. Yes. 21 MR. CAGNOLI: Objection. 22 MR. POWELL: Objection. 23 BY MR. PAUL: 24 Q. Can you tell me how many times you 25 know of that he did that, if you can?

Page 70	Page 72
1 a piece of emery paper and send it. 2 Q. As you look back on it, do you believe 3 that the removal of old gasket material from 4 let's say a flange, a pipe flange, created any 5 visible dust? 6 A. Absolutely. 7 Q. And would this -- would you and your 8 father do gasket work on a regular basis would 9 you say? 10 A. The gasket work was more an exception. 11 Again, the air compressors and the power 12 assemblies, that was more, you know, more of 13 an exception. My father was the type that he 14 took a lot of pride in what he did. He didn't 15 want to send a locomotive out of that shop 16 that wasn't running because that meant that a 17 couple cars weren't going because of the 18 trailer and tonnage and everything. So, we 19 did everything within our power to make sure 20 that locomotives ran. 21 Q. I don't know if I heard you correctly, 22 but did you and your father also install 23 and/or remove car brakes or did you do mostly 24 locomotive brakes? 25 A. The majority of what we did there was	1 on. So, anything that we removed, anything 2 that we interrupted a new piece went on. 3 Q. And for a specific manufacturer's 4 component, like this Gardner Denver air 5 compressor, would you and your father 6 fabricate the gaskets or would you use a 7 Gardner Denver replacement gasket? 8 A. All fabrication. 9 Q. Okay. 10 And I think when Mr. Ryan was 11 asking you some questions he asked you some 12 questions about -- was it brake valves, 13 Westinghouse brake valves? 14 A. Westinghouse brake valves on freight 15 cars. 16 Q. As you sit here today, do you associate 17 any asbestos-containing components with the 18 Westinghouse brake valves? 19 A. On the gaskets to the brake valves they 20 were rubber gaskets. I can only assume that 21 they didn't have any asbestos. 22 Q. Okay, fair enough. 23 Regarding the EMD -- and I 24 assume these are diesel locomotives? 25 A. Diesel electric locomotives.
Page 71	Page 73
1 locomotive work. The car brakes were by 2 exception, other than again the cabooses and 3 the tank cars that brought fuel in. 4 Q. You mentioned Gardner Denver as a 5 manufacturer of air compressors. Were these 6 air compressors located on or in the 7 locomotive I take it? 8 A. They were in on the Number 2 end of the 9 locomotive which is along the end. 10 Q. And is there a simple explanation as to 11 what these air compressors did, these Gardner 12 Denver air compressors? 13 A. That's the air that provides the 14 braking for the train. 15 Q. Okay. 16 And do you associate any gasket 17 components with the maintenance repair and/or 18 installation of the Gardner Denver air 19 compressors? Were there any gaskets used when 20 you would service the air compressors? 21 A. The gaskets that we used when we -- we 22 never applied an old gasket. 23 Q. Right. 24 A. So, if we pulled a head off of a final 25 discharge valve off we always put a new gasket	1 Q. Okay. 2 And looking back on it 3 certainly we're talking -- or it was your 4 understanding that these EMD locomotives 5 obviously contained gasket material or 6 gaskets; is that fair? 7 A. Yes. 8 Q. And likewise, they would have 9 contained, depending on the particular model 10 of locomotive, up to 24 brake shoes, these 11 locomotives? 12 A. Yes. 13 Q. What were the various combinations of 14 total number of brake shoes per a particular 15 locomotive that you can recall? 16 A. The older style, the switch engine had 17 class brakes. The GP38s that came in they had 18 just a single brake shoe that worked off a 19 slack adjuster that worked between wheels. 20 They were not a class brake. So, there were 21 some differences in the brake arrangement. 22 Q. And again, depending on the size and 23 configuration of the particular EMD 24 locomotive, to do a total brake change-out you 25 might be talking about eight, 12, 16, 20 or 24

19 (Pages 70 to 73)

TERRY CORSON

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1	locomotives and the caboose?	1 A. Yes.
2	A. I believe the boxcar shoes and the	2 Q. What were gaskets used for during the
3	locomotive shoes, the composition shoes were	3 time you worked with your father?
4	Cobra.	4 A. When we changed power assemblies in the
5	Q. Okay.	5 locomotives there were gaskets on the power
6	Do you remember the name of any	6 assemblies. And when we changed or inspected
7	other company that made any of the other	7 the final discharge valve on the air
8	brakes shoes that were used on any of the	8 compressor or we did anything to an air
9	trains that you and your father worked on?	9 compressor head there were gaskets.
10	DEFENSE COUNSEL: Objection;	10 Q. Okay.
11	asked and answered.	11 Do you know who made the power
12	BY MR. RYAN:	12 assemblies?
13	Q. Other than these?	13 A. They were -- they were for EMD
14	A. No.	14 locomotives. I can only say that they were
15	Q. You mentioned a grinding shoe?	15 EMD. I don't know if they were aftermarket.
16	A. Yes.	16 Q. You mentioned air compressors. Do you
17	Q. Do you know who made the grinding shoe?	17 know who made any of the air compressors?
18	A. No.	18 A. Gardner Denver.
19	Q. Okay.	19 Q. Anyone else?
20	And you're not sure who made	20 A. Not to my knowledge.
21	the cast iron as I understand it?	21 Q. And you mentioned valves. Do you know
22	A. No.	22 who made any of the valves?
23	Q. We talked briefly about the insulation	23 A. The brake valves when I said valves?
24	on the pipes. I mean, do you remember	24 Q. Yes.
25	anything about who made any of that?	25 A. The brake car valves were mostly
	Page 43	Page 45
1	A. No.	1 Westinghouse on the freight equipment.
2	Q. The wrapping or anything like that?	2 Q. Can you give me some idea of the number
3	A. I don't ever remember seeing any name.	3 of times that you would have to do a removal
4	Q. Okay.	4 or replacement of a gasket? I mean, was that
5	Did you personally do anything	5 an additional thing? Was that a routine
6	to try to find out who made it?	6 thing? I mean, can you give me some idea?
7	A. No.	7 A. My best guess is that in my 10 years
8	Q. Do you have any knowledge as to whether	8 working with my dad we probably changed 50
9	or not there had been any claims filed on	9 power assemblies, probably 10 a year,
10	behalf of your father against any companies	10 somewhere in that category.
11	that made asbestos products that are currently	11 Q. Okay.
12	in bankruptcy?	12 A. And as far as the air compressors, the
13	A. I don't have any knowledge of that, no.	13 work on the air compressors, that was more of
14	Q. I mean, who is involved in that? Which	14 a failure mode and that was more of a
15	member of your family is involved in sort of	15 wintertime problem where usually what would
16	the processing of claims on behalf of your	16 happen the locomotive would shut down in
17	father's estate?	17 route. By the time it got to us it would
18	A. My sister.	18 start to freeze and the air compressor seemed
19	Q. Your sister, okay.	19 to be the part that took the most damage. So,
20	So, in other words, if a	20 that would be the inspection of the heads and
21	bankruptcy claim was filed, your sister would	21 everything just to make sure we didn't have
22	more likely know about it than you do?	22 anything cracked.
23	A. Correct.	23 Q. Okay.
24	Q. Okay.	24 A. We did a couple of those a year.
25	You also mentioned gaskets?	25 Q. So, over the three or four years that

12 (Pages 42 to 45)

EXHIBIT G

STATE OF INDIANA) IN THE LAKE SUPERIOR COURT
)
COUNTY OF LAKE) ROOM NUMBER ONE

IN RE: Lake County Asbestos Litigation **ORIGINAL**

WILLIAM M. PARKS and)
WILMA PARKS, h/w)
vs.) NO. 45D01-9902-CT-154
A.P. GREEN SERVICES, INC., et al)

**DEFENDANT AMERICAN STANDARD INC.'S
RESPONSES TO MASTER INTERROGATORIES
AND REQUESTS FOR PRODUCTION TO ALL DEFENDANTS**

Pursuant to the Indiana Rules of Civil Procedure, Defendant American Standard Inc. ("ASI" or "this Defendant") provides the following Responses to Master Interrogatories and Requests for Production to All Defendants.

**PRELIMINARY STATEMENT AND
GENERAL OBJECTIONS**

This Defendant's Response to each of these Interrogatories and Requests for Production incorporates this Preliminary Statement and these General Objections.

The information used in responding to these Interrogatories and Requests for Production was assembled by authorized employees and counsel for this Defendant and was derived primarily from ongoing discussions with this Defendant's past and present employees. Because much of the information is of, or relates to, events of many years ago, it is difficult, if not

chrysotile asbestos was added to the wear stock of COBRA® composition shoes. The COBRA® composition brake shoes that contained asbestos contained chrysotile fibers totally encapsulated in a resin and synthetic bond.

From 1927 through 1964, WABCO manufactured and sold steam driven air compressors for railroad steam locomotives. Within these compressors were certain high temperature gaskets that contained chrysotile asbestos. WABCO did not manufacture the gaskets but bought them in completed form. Such gaskets contained 1/32" asbestos completely encased between layers of copper sheeting. Those gaskets were called "Cobestos" and made by Metallo Gasket Company.

From 1944 through 1985, WABCO sold diesel driven air compressors for use in diesel electric railroad locomotives. Those compressors contained certain high temperature gaskets that contained small amounts of encapsulated, chrysotile asbestos fiber. The high temperature gaskets were not manufactured by WABCO, but were purchased in completed form without change. Such gaskets were manufactured by Armstrong or Garlock.

From late 1969 or early 1970 until 1976, WABCO occasionally supplied Budd style disc brakes which contained brake linings with an unknown, but encapsulated, chrysotile fiber content. Such brakes were applied strictly to some mass transit commuter vehicles and to AMTRAK intercity vehicles. The brake linings were not manufactured by WABCO, but were purchased in completed form without material alteration. From 1970-74, the linings were manufactured by Raybestos-Manhattan. From 1974-76, the linings were manufactured by Johns-Manville Corporation. The trade name of Budd disc brake was initially used for the disc brakes.

EXHIBIT H

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1 IN THE CIRCUIT COURT FOR THE
2 COUNTY OF SPOTSYLVANIA, VIRGINIA

3 JANET GALLANT PITTS, : CIVIL ACTION

4 Executrix of the Estate of :

5 WILLIAM E. PITTS :

6 vs. :

7 BORG-WARNER CORPORATION, :

8 et al. : 177CL01-282

9 Philadelphia, Pennsylvania

10 July 11, 2006.

11 Pretrial examination of
12 HORACE M. DELISGER, M.D., taken on behalf
13 of the Plaintiff at the Sheraton
14 University City Hotel, 36th and Chestnut
15 Streets, Philadelphia, Pennsylvania, on
16 the above date, commencing at 5:05 p.m.,
17 before Linda A. Ricciardi, Certified Court
18 Reporter.

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24 Honeywell International, Inc.
25

020

1 Q. Dr. Delisser, my name as you heard
2 is John Cosmich, I represent
3 Owens-Illinois. Do you know anything
4 about Owens-Illinois at all?

5 A. Not much. I know there is a
6 connection with the companies in the past
7 that may have made insulation products
8 that I think you are connected with now,
9 but I couldn't give you the lineage.

10 Q. Fair enough. Now, I apologize, I
11 have not been provided with any of your
12 previous depositions, okay, and I don't
13 want to keep us here all night by any
14 stretch, but I do want to get into a
15 little bit of background first, if that is
16 okay. And just to start that, where did
17 you go to medical school?

18 A. University of Pennsylvania.

19 Q. If you would just briefly outline,
20 rather than me asking all the questions,
21 you know where I am going so why don't you
22 tell me about your educational background
23 and your training, et cetera?

24 A. Sure. I went to Temple under

022

1 teach?

2 A. Yes.

3 Q. Would you agree with me that
4 exposure to chrysotile asbestos can cause
5 asbestosis?

6 A. What I would say is we have to be
7 specific about the conditions of the
8 exposure, the amount of exposure, the
9 duration of exposure, and given all of
10 those things there is a potential for
11 chrysotile to cause or contribute to the
12 development of lung disease, but, again,
13 as I said, you have to speak in terms of
14 dose, duration, intensity, occupation.

15 Q. We will get into each of those
16 shortly, but would you agree with me that
17 exposure to chrysotile asbestos can cause
18 mesothelioma?

19 A. Again, I don't want to sound like a
20 broken record, but I think the statement
21 has to be qualified by the other things I
22 mentioned, dose, duration, intensity and
23 nature of occupation.

24 Q. So at certain doses, at certain

023

1 durations and with respect to certain
2 occupations you agree that chrysotile can
3 cause mesothelioma?

4 A. It could.

5 Q. And I have to ask those, I don't
6 know where you stand on this, okay. At
7 what dose level does chrysotile asbestos
8 cause mesothelioma?

9 A. The precise, the exact threshold is
10 still a subject of debate and contention.
11 So I can't give you a precise number, but
12 certainly you are looking at exposures
13 that are anywhere from 10 to 15 to 20
14 fibrous CCs of exposure and above, at a
15 minimum, at a minimum.

16 Q. What literature or articles do you
17 base that opinion on, that being it would
18 be a minimum of 10 to 15 to 25 fibrous per
19 CC of chrysotile to cause mesothelioma?

20 A. I think there are a number of texts
21 that have reviewed this, I would cite
22 Churdsworth in his text, I would also cite
23 some of Rodley's work.

24 Q. Are you aware of any literature that

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1 amphiboles as well, and to just find
2 chrysotile alone is highly unlikely, again
3 at significant levels.

4 Q. Would you agree with me that it is
5 generally felt that mesothelioma arises
6 from a single cell?

7 MR. DICKEY: Object to the form
8 of the question.

9 THE WITNESS: I guess I am
10 pausing a little bit because, you
11 know, cancer may begin with a single
12 cell, but usually it requires
13 multiple processes that are in play.

14 BY MR. COSMICR:

15 Q. Would you agree with me that it is
16 generally felt that there must be multiple
17 changes to a particular cell before it
18 will become bad and become a cancer?

19 A. Right, there are multiple steps in
20 the process of becoming a malignant cell.

21 Q. And that is true for mesothelioma as
22 well?

23 A. Yes.

24 Q. As best we know?

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1 A. Yes.

2 Q. And, of course, we don't know from
3 which fiber, from which year that actually
4 caused a particular cell to go bad,
5 correct?

6 A. Are you talking about a single fiber
7 with a single cell?

8 Q. Yeah.

9 A. There is no way of knowing.

10 Q. We don't know which of those changes
11 that occur to make a cancer or a
12 mesothelioma arise or begin that are
13 caused by asbestos, do we?

14 A. Say that again.

15 Q. We don't know which of the changes
16 that occur to a cell to make it a cancer
17 or that are actually caused by asbestos,
18 do we?

19 A. Are you asking are there co factors?

20 Q. Right.

21 A. There may be co factors besides
22 asbestos fibers.

23 Q. But we also don't know which of the
24 specific changes are caused by asbestos?

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1 A. You are talking about molecular
2 changes?

3 Q. Right.

4 A. I still think the state of knowledge
5 is such that we are still trying to
6 understand exactly how asbestos fibers
7 induces cancer.

8 Q. We don't know whether or not those
9 changes at the cellular or molecular level
10 are any different with respect to an
11 amphibole fiber or a chrysotile fiber, do
12 we?

13 MR. DICKEY: Object to the form
14 of the question.

15 THE WITNESS: I think what is
16 clear is that chrysotile is less
17 carcinogenic, significantly less
18 carcinogenic, it may even not be, I
19 think the data suggests certainly
20 less carcinogenic and may not be,
21 and so the mechanisms that
22 chrysotile may induce cancer may
23 well be different from say an
24 amphibole.

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1 I mentioned also the issue of
2 persistence, I think that has to be
3 kept in mind that the lung is much
4 more likely to be exposed for a
5 longer duration to an amphibole
6 fiber than a chrysotile fiber.

7 So persistence, and I think
8 also the fibers are different and
9 certainly likely to induce different
10 mechanisms, and, again, we have data
11 that fully indicates that a person
12 exposed to chrysotile is much less
13 likely to come down with a
14 malignancy.

15 BY MR. COSMICH:

16 Q. You are not espousing the opinion
17 today that chrysotile is not carcinogenic?

18 A. Right, I am not saying that. What I
19 am saying is the risk is less, and it is
20 significantly less than compared to
21 amphiboles.

22 Q. You don't doubt that Mr. Pitts in
23 the course of his employment was exposed
24 to chrysotile from other products, are

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1 you, in the insulation product, et cetera
2 that he was exposed to?

3 A. Say it again.

4 Q. You don't doubt that Mr. Pitts was
5 exposed to chrysotile from other products,
6 not friction products but other products
7 in the course of his work?

8 A. I can't recall all the specifics
9 that he could have been exposed to, but
10 certainly there was asbestos in a lot of
11 different products so there is the
12 potential for him to be exposed to
13 different things other than just the
14 friction products.

15 Q. To adequately determine his total
16 dose of chrysotile and thus his potential
17 risk from chrysotile exposure you need to
18 consider all the sources of his chrysotile
19 exposure, wouldn't you?

20 MR. DICKY: Object to the form
21 of the question.

22 THE WITNESS: I guess what I
23 would say is it would be important
24 to understand what all his exposures

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1 were.

2 BY MR. COSMICR:

3 Q. All of his chrysotile exposures
4 would be important to assessing his total
5 effect?

6 MR. DICKEY: Object to the form
7 of the question.

8 THE WITNESS: I guess what I
9 would say is that is important
10 information to have, but, again, it
11 would come back to a specific
12 exposure, and if we are focusing on
13 the exposure associated with being a
14 mechanic, the exposure associated
15 with friction products like brakes
16 we have literature that says that
17 specific exposure, that specific
18 exposure is not associated with
19 development of mesothelioma, lung
20 cancer or asbestosis.

21 BY MR. COSMICR:

22 Q. Well, does it say it is not if it is
23 combined with other chrysotile exposure,
24 does it?